JUL 10 1995

CERTIFIED MAIL P 011 468 178
RETURN RECEIPT REQUESTED

Jerry Covey
RCRA Field Operations Manager
Union Pacific Railroad Company
1416 Dodge Street, Room 930
Omaha, Nebraska 68179

Dear Mr. Covey:

RE: Request for Information and Visual Site Inspection for the Union Pacific Railroad Company, Omaha, Nebraska

The U.S. Environmental Protection Agency Region VII (EPA), is currently conducting a Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA) on the facility located at 9th and Cass, Omaha, Nebraska. The preliminary review (PR) is the first step in the RFA process. The purpose of the PR is to gather and evaluate existing information on the facility in order to identify and characterize (1) solid waste management units (SWMUs), (2) areas of concern (AOCs) and (3) actual and/or potential releases. Enclosure 1 contains a list of information needed to complete the RFA, which should either exist in the facility files or be available from facility personnel. EPA is authorized to request this information and to conduct the RFA under 3007 and 3013 of RCRA.

Your facility may, if it desires, assert a business confidentiality claim covering part or all of the information submitted to, or reviewed by, EPA. Such a claim may be made by placing on (or attaching to) the information, at the time of its submittal to EPA, a cover sheet, stamped or printed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Allegedly confidential portions of otherwise nonconfidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by EPA. If confidential treatment is sought only until a certain date or until the occurrence of a certain event, the request should so state.

Information submitted for which a claim of confidentiality is made will be disclosed by EPA only to the extent and by means authorized by the procedures specified in 40 C.F.R. Part 2, Subpart B. If no such claim is made when information is received by EPA, information may be made available to the public without further notice.

EPA hereby requests that the information requested be furnished within twenty (20) days of your receipt of this letter. Your failure

ART/RCRA/RCOM:HUFFMAN:ns:7305:06/30/95:b:Omaha
RCOM HUFFMAN 7/5/95
RCOM DOYLE 7/5/95

to respond with complete and accurate information may subject you to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928. Such enforcement action may include the assessment of penalties of up to twenty-five thousand dollars ($25,000) for each day of non-compliance.

You are requested to submit this information to:

Diane Huffman
Compliance Section, RCRA Branch
U.S. Environmental Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

The visual site inspection (VSI) is the second step of the RFA process. The purposes of the VSI include (1) inspecting the entire facility, (2) determining whether all SWMUs and AOCs have been identified, and (3) obtaining additional information. PRC Environmental Management, Inc. (PRC), which is EPA's authorized representative, will be conducting the VSI at the Union Pacific Railroad Company, 9th and Cass, Omaha, Nebraska beginning the morning of July 31, 1995. It is expected that the VSI will also continue on August 1. No samples will be taken during the VSI. During the scheduled VSI, a member of your staff and/or an environmental representative will need to be available to assist in scheduling and coordinating VSI-related activities, conduct a tour of the facility, and answer facility-related questions. Also, during the evaluation, PRC personnel may require access to the facility files to review and obtain copies, as necessary, of any documents pertaining to the facility's waste management practices or processes. Photographs of each SWMU will also be taken to document conditions at the facility and procedures used.

On the day of the VSI, EPA will be represented by Claudia Vines and Martha Radke of PRC. Enclosure 2 contains descriptions of the above-mentioned PRC staff.

If you have any questions regarding this matter, you may contact Diane Huffman at (913) 551-7544.

Sincerely,

David Doyle
Chief
RCRA Compliance Section

Enclosures (3)

cc: Bill Imig, NDEQ
Paige Marett, PRC

bcc: Marc Rivas, RCOM

ENCLOSURE 1

INFORMATION REQUEST
FOR THE UNION PACIFIC RAILROAD COMPANY
9TH AND CASS
OMAHA, NEBRASKA

When reference is made to a Solid Waste Management Unit (SWMU) in this request, the following definition shall apply. A SWMU is any discernible unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include any area at a facility at which solid wastes have been routinely and systematically released. Examples of SWMUs include: landfills, surface impoundments, waste piles, land treatment units, incinerators, injection wells, above and below ground tanks (including 90-day accumulation tanks), transfer stations, drum storage areas, and waste recycling operations. In addition, EPA has interpreted the term to apply to areas associated with production processes which have become contaminated as a result of routine and systematic releases of hazardous waste or hazardous constituents (a product may become a waste if it is abandoned or discarded). The following information is requested:

1. A map of the entire facility labeling property boundaries; buildings; all SWMUs and AOCs, past and present, including all of those included in the list following this request; land use of all property surrounding the facility; and direction of surface water drainage flow. This map shall indicate the scale and/or be adequately dimensioned. Provide a hard copy of this information and an electronic copy if available.

2. A completed SWMU information form for all SWMUs and AOCs. A hard copy of the form follows this information request, and electronic copies of the form are provided on the enclosed disk in WordPerfect 5.1 and WordPerfect 6.1. Each SWMU and AOC shall be labeled and clearly identified on a facility map.

3. Provide the following background information for the facility:

   a. Former and current owners and operators and dates of ownership and operations;
   b. Description of current and former processes (provide a flow diagram of all processes at the facility in hard copy and electronic copy if available), operations, activities, waste generated, and waste handling and disposal practices;
   c. Production rates;
   d. List of raw materials and quantities used;
   e. Dates of Operation;
   f. Number of Employees, and
   g. Area in acres.

4. Provide any existing analytical data for the following media:

   - Soil;
   - Surface water;
   - Sediment;

- Groundwater;
- Air, and
- Waste (for hazardous waste determination).

5. Provide a list of the types of all environmental permits, current and past, that have been issued to the facility and the status of the permits.

6. Provide a list of all parts washers used at the facility. Identify their locations on a map and provide the period of operation for each unit.

7. Provide the location and use of all groundwater wells on the facility property. Provide the total depth, screened interval, and copies of well logs if available.

8. Provide the dates and locations of all spills or releases of hazardous waste or hazardous constituents at the facility. Provide the quantity of material released for each incident.

SWMU AND AOC INFORMATION FORM

NAME OF SWMU AND AOC:

Unit Characteristics

1. Location

2. Dates of operation

3. Dates of closure and information on closure proceedings

4. Physical description
   a. Materials of construction

   b. Dimensions

   c. Associated equipment (secondary containment, piping, etc)

   d. Capacity

Waste Characteristics and Management

1. Type of waste

2. Quantity generated (annually, monthly, etc.)

3. Physical properties

4. Hazardous waste determination information and EPA hazardous identification number

5. Where waste is generated or received

6. Where and how waste is currently disposed of

7. Where and how waste was formerly disposed of

History and Potential for Release and Corrective Measures Taken

Ground Water -

Surface Water -

Air -

Surface Soil -

Subsurface Soil -

LIST OF SOLID WASTE MANAGEMENT UNITS AND AREAS OF CONCERN
UNION PACIFIC RAILROAD COMPANY
OMAHA, NEBRASKA
(Sheet 1 of 8)

Unit No.	SWMU/AOC Name	Wastes or Potential Hazardous Constituents	Time in Service	Description/Location	Reference
1	Oil Storage Tank	Diesel	Installed in the 1940s	20,000-gallon tank used for diesel storage, Fuel oil No. 2 detected at 6,900 milligrams/kilogram, some heavy metals detected in soil.	04/90 site investigation report
2	Roundhouse	Not available	Not available	Formerly near MW-1; structurally all that remains of the facility is the locomotive turntable and foundation remnants. Concentrations of 1,2-dichloroethane, chlorobenzene, selenium, nickel, and petroleum hydrocarbons were detected above NDEC MCLs in groundwater.	04/90 site investigation report
3	Wastewater Treatment Facility/ Babbitt Shop	Petroleum hydrocarbons, VOCs, metals	Not available	The Wastewater Treatment Facility lies over the area where the Babbitt Shop was located. MW-2 is located east of the Wastewater Treatment Facility. Concentrations of lead, arsenic, and selenium were detected in groundwater above NDEC MCLs. High levels of lead and petroleum hydrocarbons were detected in the soils.	04/90 site investigation report
4	Gas House	Petroleum hydrocarbons	Not available	Location identified from historical blueprints. Gas house includes gasoline off loading area, pumphouse, and storage capabilities.	04/90 site investigati[redacted] report
5	Stores Area (East and West)	VOCs, petroleum hydrocarbons	Not available	Omaha Stores fills requisitions and furnishes materials and supplies to all UPRR departments.	04/90 site investigation report

LIST OF SOLID WASTE MANAGEMENT UNITS AND AREAS OF CONCERNS
UNION PACIFIC RAILROAD COMPANY
OMAHA, NEBRASKA
(Sheet 2 of 8)

Unit No.	SWMU/AOC Name	Wastes or Potential Hazardous Constituents	Time in Service	Description/Location	Reference
6	Traction Motor Shop	Degreasing solvents, VOCs, petroleum hydrocarbons	Modernized in 1975	MW-3 is located along the east side of the building. MW-17 is located on the exterior north end of the shop. Elevated levels of petroleum hydrocarbons and diesel fuel were found in the soils. Arsenic and selenium concentrations above MCLs in groundwater. 2-methylnaphthalene above MCLs in soil.	04/90 site investigation report
7	Old Traction Motor Shop	VOCs used as degreasing agents	Not available	Formerly located near the Print Shop. Shop no longer in existence; location identified by employee interviews.	04/90 site investigation report
8	Blue Building	Petroleum hydrocarbons, degreasing solvents, caustics	Not available	Area used to disassemble, clean, and qualify for reuse all mechanical locomotive parts. MW-10 is located along east side of the Blue Building. Includes aboveground tank containment. Trichloroethene and tetrachloroethene detected in soil samples near storage tanks north of building, polychlorinated biphenyls detected along east side of building.	04/90 site investigation report
9	New Transformer Storage Area	Polychlorinated biphenyls	Not available	Area located near the fuel storage area on the east side of the facility. MW-9 is located at the northeast corner of the building.	04/90 site investigation report
10	Old Transformer Storage Area	Polychlorinated biphenyls	Not available	Located adjacent to Izard Street near MW-7 and MW-8.	04/90 site investigation report
11	Acetylene Pit	Metals, petroleum hydrocarbons	Not available	Located near MW-4 and the Bearing Shop. Building no longer in existence; location identified by blue prints and employee interviews.	04/90 site investigation report

LIST OF SOLID WASTE MANAGEMENT UNITS AND AREAS OF CONCERNS
UNION PACIFIC RAILROAD COMPANY
OMAHA, NEBRASKA
(Sheet 3 of 8)

Unit No.	SWMU/AOC Name	Wastes or Potential Hazardous Constituents	Time in Service	Description/Location	Reference
12	Oil Tanks/Pump House	Petroleum hydrocarbons, total metals	Not available	Tanks no longer in operation. Location identified by historical blueprints. Foundation remnants and ancillary piping still remain. 6,000-gallon fiberglass reinforced plastic tank (19 feet x 7 feet) removed on 11/10/92 at 12th & Webster. Soil samples contained elevated levels of petroleum hydrocarbons.	04/90 site investigation report, 01/93 closure assessment report
13	Bearing Shop	VOCs for degreasing	Not available	A production support area for the Wheel Shop conducting bearing removal and cleaning/degreasing of wheel units. Bearing shop has a concrete floor surface. Soil samples contain elevated levels of petroleum hydrocarbons (gasoline). Based on field observation, area may have VOC contamination.	04/90 site investigation report
14	Wheel Shop	Petroleum hydrocarbons, VOCs, metals	Not available	Produced locomotive and car wheels for UPRR system. Production processes include dismounting, turning, remounting, and assembly with new or rebuilt traction motors. MW-15 is located at northeast corner of building; MW-4 is located south of the Wheel Shop. Production area was identified as using a number of vats and underground tanks. Selenium detected in groundwater below MCL of 10 ppb.	04/90 site investigation report

LIST OF SOLID WASTE MANAGEMENT UNITS AND AREAS OF CONCERNS
UNION PACIFIC RAILROAD COMPANY
OMAHA, NEBRASKA
(Sheet 4 of 8)

Unit No.	SWMU/AOC Name	Wastes or Potential Hazardous Constituents	Time in Service	Description/Location	Reference
15	Power House (Old and New)	Petroleum hydrocarbons	Constructed in 1963	MW-16 located northeast of the Power House. Power House has a capacity of 240,000 pounds of steam per hour from three combination liquid fuel/natural gas powered boilers. Aboveground storage tank for fuel is located north of the Power House. Semi-VOC levels exceeded maximum allowable levels in soils near the Power House.	04/90 site investigation report
16	Chemical Storage Building	Metals, VOCs, semi-VOCs	Not available	Located near the Fuel Storage Area and the Temporary Hazardous Waste Storage Area.	04/90 site investigation report
17	Oil and Waste House	Petroleum hydrocarbons	Not available	Location near the Steel Shop was identified from historical blueprints.	04/90 site investigation report
18	Fuel Storage Area	Petroleum hydrocarbons	Not available	MW-9 located south of the Fuel Storage Area along southwest side of the site. Area includes two aboveground storage tanks (one gas, one diesel) and one fiberglass underground storage tank (gas). Two aboveground storage tanks each have a 3-foot high concrete spill containment wall.	04/90 site investigation report
19	Temporary Hazardous Waste Storage Area	Not available	Not available	Located near MW-9 and the Chemical Storage Area.	04/90 site investigation report

LIST OF SOLID WASTE MANAGEMENT UNITS AND AREAS OF CONCERNS
UNION PACIFIC RAILROAD COMPANY
OMAHA, NEBRASKA
(Sheet 5 of 8)

Unit No.	SWMU/AOC Name	Wastes or Potential Hazardous Constituents	Time in Service	Description/Location	Reference
20	Car Dismantle Area (East and West)	Insulation containing asbestos	Not available	Dismantling of steam locomotives, including asbestos containing boiler insulation in the southern part of the east area. MW-7 and MW-8 located west of the west area. Nine soil samples contained chrysotile asbestos above 1 percent. Two of the nine samples contained 60 percent asbestos.	04/90 site investigation report
21	Paint Barrel Pits	Metals, VOCs, semi-VOCs	Not available	Located south of the intersection of 12th and Izard Streets in the Car Dismantle Area. Location identified on historical blue prints. Included two pits that measured 150 feet x 21 feet. High concentration semi-VOCs were detected in soils. The levels of lead and antimony exceeded the NDEC action levels established for the site.	04/90 site investigation report
22	Car Shop	Metals (chrome and brass), cyanide	Not available	Shop equipped to perform chrome and brass plating, tin smithing, upholstering, and carpentering operations for special projects and car remodeling. Includes a cyanide tank of unknown description. Located in the middle of the site near the Steel Shop. Area may also be called the Plating Shop. 10/14/93 letter states that Plating Shop and all tanks and equipment have been removed. Metal finishing operations no longer conducted.	04/90 site investigation report
23	Steel Shop	Not available	Not available	The Steel Shop is the final step in the repair and painting of damaged cars. Waste sump located within building. Shop located near the Car Holding Area and the Oil and Waste House.	04/90 site investigation report

LIST OF SOLID WASTE MANAGEMENT UNITS AND AREAS OF CONCERNS
UNION PACIFIC RAILROAD COMPANY
OMAHA, NEBRASKA
(Sheet 6 of 8)

Unit No.	SWMU/AOC Name	Wastes or Potential Hazardous Constituents	Time in Service	Description/Location	Reference
24	Car Holding Area	Not available	Not available	Purpose was to initiate the repair process of damaged cars prior to completion inside the Steel Shop. Located directly north of the Steel Shop.	04/90 site investigation report
25	Car Demolish Area	Metals	Not available	MW-6 constructed on the east side of the north demolition pit. Area comprised of three cinder pits where damaged railcars were cut up for scrap. Selenium levels in groundwater exceeded the NDEC MCL.	04/90 site investigation report
26	Open Drum Storage Area (ODSA) (North and South)	Not available	Not available	MW-14 located south of MW-12 on the south side of Seward Street. MW-5 is located in the open drum storage area, west of the railroad tracks in the south area. South of the open drum storage area is an active drum storage area. The north open drum storage area is used for semi-trailer parking and miscellaneous equipment storage. Zinc, copper, and lead were detected in soil samples in this area. Lead concentrations exceed recommended MCL. Elevated metals also were detected in groundwater above NDEC MCLs. High levels of VOCs also identified in groundwater, 1 to 2 percent asbestos identified.	04/90 site investigation report
27	Eighth Street Yard (South, Central, and North Sections)	Petroleum hydrocarbons	Not available	Car holding area and an active switching yard. MW-11 located in the central section on the east [illegible] the railroad tracks. Elevated levels of metals detected [illegible] groundwater.	04/90 site investigation report

LIST OF SOLID WASTE MANAGEMENT UNITS AND AREAS OF CONCERNS
UNION PACIFIC RAILROAD COMPANY
OMAHA, NEBRASKA
(Sheet 7 of 8)

Unit No.	SWMU/AOC Name	Wastes or Potential Hazardous Constituents	Time in Service	Description/Location	Reference
28	Grace Street Yard	Petroleum hydrocarbons	Not available	Used as a car holding and fueling area and as a car storage area. MW-12 was constructed south of the aboveground storage tank in the Grace Street Yard. Metals and VOCs detected above NDEC MCLs in groundwater.	04/90 site investigation report
29	Grace Street Tank	Petroleum hydrocarbons	Not in use and reportedly empty	55,000-gallon aboveground storage tank used for diesel storage. Tank provided diesel fuel for the Grace Street Yard, Locomotive Shop, and Union Station on South 10th Street. MW-13 is located northeast of the Grace Street Tank. High levels of diesel fuel contamination detected in soils near base of tank.	04/90 site investigation report
30	Oil Pipeline	Petroleum hydrocarbons	Not available	4-inch-diameter pipe running the length of the shop site originating at the Grace Street Tank and terminating at 10th Street. Petroleum hydrocarbons from gasoline, No. 1 fuel oil, and No. 2 fuel oil were detected in the soils.	04/90 site investigation report
31	Fuel Recovery Area	Petroleum hydrocarbons	Not available	Located in the south part of the Omaha Shops, southeast of the Locomotive Shop, and south of the Wastewater Treatment Plant. Adjacent to or near the Diesel Servicing Facility, Oil Storage Area, and Oil Pipeline.	3/92 Phase II inspection report, 04/90 site investigation report
32	Diesel Servicing Facility	Petroleum hydrocarbons	Not available	Facility used to fuel switch units and to provide them with sand and water. Located immediately southeast of the Machine Shop.	03/92 Phase II inspection report

LIST OF SOLID WASTE MANAGEMENT UNITS AND AREAS OF CONCERNS
Union Pacific Railroad
Omaha, Nebraska
(Sheet 8 of 8)

Unit No.	SWMU/AOC Name	Wastes or Potential Hazardous Constituents	Time in Service	Description/Location	Reference
33	Bottom of Large Cleaning Vats	Petroleum hydrocarbons, solvents	Not available	Generation rates during June 1979 were: Drain Oil — 30 drums, Heavy Grease — 30 drums, Paint Thinner — 52 drums, Cleaning Vat Sludge — unknown periodic accumulation.	07/16/79 letter from UPRR to NDEC
34	Construction Area	Not available	Not available	100 acres in the central portion of the Omaha Shops that may be disturbed by future construction. Major existing buildings include: Fabrication Shop, Print Shop, Wheel Shop, Car Shop, Steel Shop, Wood Mill Building, Traction Motor Shop, and Power House.	03/92 Phase II inspection report

Notes:

MW-1	Monitoring Well
NDEC	Nebraska Department of Environmental Control
MCL	Maximum Contaminant Levels
UPRR	Union Pacific Railroad Company
VOC	Volatile Organic Compound
Semi-VOC	Semivolatile Organic Compound
ODSA	Open Drum Storage Area

ENCLOSURE 2

PRC STAFF CREDENTIALS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

TO WHOM IT MAY CONCERN:

This certifies that Claudia Vines whose signature and physical description appear below, is designated an authorized contractor of the U.S. Environmental Protection Agency for the period of July 15, 1995 through December 31, 1995. This person is hereby authorized to conduct these official investigations and inspections pursuant to section 3007 of the Resource Conservation and Recovery Act (RCRA) as amended, 42 U.S.C. Section 6927.

Section 3007(b) of RCRA and 40 CFR Part 2, define the Agency's policies regarding protection of trade secrets and confidential information.

Age: 33

Height: 5' 6"

Weight: 116 lbs.

Color of Hair: Brown

Color of Eyes: Blue

Affiliation: PRC

Claudia Vines
Contractor's Signature

Karen A. Flournoy
Karen A. Flournoy
Deputy Director
Air, RCRA and Toxics Division
U.S. Environmental Protection Agency

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

TO WHOM IT MAY CONCERN:

This certifies that Martha Radke whose signature and physical description appear below, is designated an authorized contractor of the U.S. Environmental Protection Agency for the period of July 15, 1995 through December 31, 1995. This person is hereby authorized to conduct these official investigations and inspections pursuant to section 3007 of the Resource Conservation and Recovery Act (RCRA) as amended, 42 U.S.C. Section 6927.

Section 3007(b) of RCRA and 40 CFR Part 2, define the Agency's policies regarding protection of trade secrets and confidential information.

Age: 35

Height: 5' 9"

Weight: 135 lbs.

Color of Hair: Brown

Color of Eyes: Blue

Affiliation: PRC

Martha A. Radke
Contractor's Signature

Karen A. Flournoy
Karen A. Flournoy
Deputy Director
Air, RCRA and Toxics Division
U.S. Environmental Protection Agency